

REMARKS

Claims 1-20, all the claims pending in the application, stand rejected on prior art grounds.

Preliminary Matters

Applicants thank the Examiner for acknowledging the claim for priority under 35 U.S.C. § 119 and receipt of the certified copy of the priority document. Applicants also thank the Examiner for initialing and returning the SB/08 Forms submitted with the Information Disclosure Statements (IDSs) filed June 7, 2007, August 10, 2006, and March 7, 2005, thereby indicating that the references listed therein have been considered. The Examiner's acceptance of the drawings is further appreciated.

Claim Rejections - 35 U.S.C. § 102(e)

The Examiner has rejected claims 1, 3-4, 6, 10-11, 13-15, and 20 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent Application Publication No. 2002/0107973 to Lennon et al. (hereinafter "Lennon"). Applicants submit that the claims are patentable.

For example, claim 1 recites an apparatus which includes a mapping module and a search module. The mapping module converts received external digital content metadata into digital content metadata peculiar to the network, and the search module locates a method of accessing a program in a predetermined manner using a unique identifier assigned to each program in the received external digital content metadata.

Lennon is directed to a media browser 101 which accesses metadata over the Internet 102 (paragraph 71). The media browser 101 can access metadata stored in an XML repository 200 using a link to an XML description of the repository 200. Each XML description contains a link 201 to a corresponding multimedia item in a content collection 201 (paragraph 72). The link 201

may be expressed as a Uniform Resource Indicator (URI) (paragraph 71). If access to a non-XML metadata is desired, the link must operate through a server module called a metadata server 212 which is controlled by the owner of the metadata. The metadata server 212 translates metadata stored in a legacy database 210 to the XML format required by the media browser 101 (paragraph 73). Specifically, the legacy database 210 stores metadata using Standard Query Language (SQL), while the XML document, and hence the media browser 101, represent information in a hierarchical fashion (paragraph 125). The metadata server 212 provides a bridge between the two representations (*Id.*).

The Examiner seems to contend that Lennon's metadata server 212 which translates the non-XML metadata corresponds to the claimed mapping module. The Examiner also seems to contend that Lennon's media browser 201 which accesses the multimedia item based on the URI corresponds to the claimed search module.

However, Lennon discloses that the metadata server 212 is external to the computer system which includes the media browser 101 (See Fig. 2). Additionally, Lennon discloses that the metadata server 212 is preferably located at the site of the metadata and controlled by the owner thereof (paragraph 72), while the media browser 101 belongs to a local computer 105 which may acquire access to the metadata server 212 via the internet (paragraph 66 and Fig. 2). Thus, Applicants submit that Lennon does not teach an apparatus which includes *both* a mapping module which receives and converts external digital content metadata and a search module which accesses a program in the received external digital content metadata. Instead, Lennon's local computer 105 including browser 101 merely accesses a multimedia item receives metadata *which has already been converted* and therefore does not include the claimed mapping module.

Likewise, the terminal at which the metadata server 212 is located merely translates metadata into XML metadata and does not access a program based on the converted metadata.

Because Lennon does not teach all of the features of claim 1, Applicants submit that the claim is not anticipated by Lennon.

Independent claims 4, 11, 14, and 15 recite features similar to those discussed above in conjunction with claim 1. Thus, Applicants submit that these claims are patentable at least for reasons analogous to those discussed above regarding claim 1. Applicants also submit that claims 3, 6, 10, 13, and 20, being dependent on one of claims 4, 11, 14, and 15, are patentable at least by virtue of their dependency.

Claim Rejections - 35 U.S.C. § 103(a)

The Examiner has rejected claims 2, 7-9, 12, and 17-19 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lennon in view of Applicant's alleged admitted prior art (hereinafter "APA"). Because these claims are dependent on one of claims 1, 4, 11, 14, and 15, and because APA does not cure the deficiencies of Lennon, Applicants submit that the claims are patentable at least by virtue of their dependency.

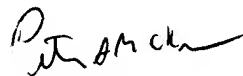
The Examiner has rejected claims 5 and 16 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lennon in view of U.S. Patent Application Publication No. 2002/0199188 to Sie et al. (hereinafter "Sie"). Because these claims are dependent on one of claims 4 and 15, and because Sie does not cure the deficiencies of Lennon, Applicants submit that the claims are patentable at least by virtue of their dependency.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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